

<b>IN RE:</b>	:	<b>CHAPTER 13</b>
<b>DEBORAH L. SAWYER</b>	:	
	:	<b>CASE NO. 4-24-02258-MJC</b>
<b>Debtor</b>	:	
	:	
<b>DEUTSCHE BANK NATIONAL TRUST:</b>	:	<b>Motion for Relief From Stay</b>
<b>COMPANY, AS TRUSTEE FOR</b>	:	
<b>AMERIQUEST MORTGAGE</b>	:	
<b>SECURITIES INC., ASSET-BACKED</b>	:	
<b>PASS-THROUGH CERTIFICATES,</b>	:	
<b>SERIES 2006-R1</b>	:	
<b>Movant</b>	:	
<b>v.</b>	:	
	:	
<b>DEBORAH L. SAWYER</b>	:	
<b>JEFFREY SAWYER</b>	:	
<b>(Non-filing Co-Debtor)</b>	:	
<b>JACK N. ZAHAROPOULOS, CH. 13</b>	:	
<b>TRUSTEE,</b>	:	
<b>Respondents</b>	:	

7. Admitted. By way of further Answer, Debtor has the ability to bring the account current and requests an opportunity to do so.

8. Admitted.

9. Admitted.

10. Neither admitted, nor denied. Debtor is without sufficient knowledge to form a belief as to the truth of paragraph 10.

11. Denied. Movant is without cause and strict proof otherwise is demanded at hearing.

12. Denied. Movant is without cause and strict proof otherwise is demanded at hearing.

13. Denied. Movant is without cause and strict proof otherwise is demanded at hearing.

14. Denied. Movant is without cause and strict proof otherwise is demanded at hearing.

15. Denied. Movant is without cause and strict proof otherwise is demanded at hearing.

16. Denied. Movant is without cause and strict proof otherwise is demanded at hearing.

WHEREFORE, Debtor prays that this Court will enter an Order as follows:

- a. Deny the Motion requesting modification of the automatic stay;
- b. Deny all attorney fees and costs to Movant;

c. Deny immediate enforcement of an Order granting relief from the Automatic Stay; and

d. Grant such other relief as is deemed appropriate.

Respectfully submitted,

Law Office of Lisa A. Rynard

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